

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

**ORAL ARGUMENT
REQUESTED**

**SCANSOFT, INC.'S MOTION FOR A PROTECTIVE ORDER
LIMITING PARTIES TO TEN DEPOSITIONS**

Pursuant to Fed. R. Civ. P. Rule 26(c), plaintiff ScanSoft, Inc. moves for a protective order limiting defendant Voice Signal Technologies, Inc. (“VST”) to ten depositions, as set forth in Fed. R. Civ. P. 30(a)(2)(A) and Local Rule 26.1(c). The grounds for this motion are set forth in the accompanying Memorandum and attached exhibits.

Accordingly, ScanSoft respectfully requests that the Court grant this motion and that defendants be limited to ten depositions of fact witnesses.

CERTIFICATE PURSUANT LOCAL RULES 7.1 AND 37.1

I certify that on May 25 and May 26, 2005, counsel for the parties conferred by telephone in an effort to resolve the issues presented in this motion, and that the parties were unable to reach an accord.

Dated: May 26, 2005

SCANSOFT, INC.,
By its attorneys,

/s/ Jack C. Schecter

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